

# EXHIBIT 4

UNITED STATES OF AMERICA *ex rel.*  
JEFFREY H. LIEBMAN and DAVID M.  
STERN, M.D.,  
  
Plaintiff-Relators,  
  
v.  
  
METHODIST LE BONHEUR HEALTHCARE  
and METHODIST HEALTHCARE-MEMPHIS  
HOSPITALS,  
  
Defendants.

Case No.: 3:17-cv-00902  
  
JUDGE CAMPBELL  
MAGISTRATE JUDGE HOLMES

**A. Individuals Likely to Have Discoverable Knowledge that the United States May Use to Support Its Claims**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), the United States adds one individual: Records Custodian for Medicare records, Safeguard Services, LLC, 3450 Lakeside Drive, Suite 201, Miramar, Florida 33027. The United States reserves its right to supplement this disclosure of name(s), and if known, of other individuals who are likely to have discoverable information or knowledge of Medicare data claims that the United States may use to support its claims (unless solely for impeachment), as well as the subject matter of that information. The United States will supplement these disclosures when it has identified these individuals, including but not limited to other employees or independent contractors, whom the United States may use to support its claims.

**B. Documents, Electronically Stored Information, and Tangible Things that the United States May Use to Support Its Claims**

Pursuant to Rule 26(a)(1)(A)(ii), the United States supplements its prior disclosures with Defendants' Medicare enrollment file, which Defendants should already have access to, since these are forms that Defendants completed and submitted to Medicare. These documents are now marked with **Bates Numbers GOV001028 – GOV004569**. In addition, the United States attaches the declarations of Relators Stern and Liebman, with exhibits, and of Michael Petron, with exhibits, that were previously filed as part of the United States' response to summary judgment. These documents are now marked with **Bates Numbers GOV004570 - GOV004951**.

Dated: May 31, 2023

Sincerely,

HENRY C. LEVENTIS  
United States Attorney  
Middle District of Tennessee

By: s/ Ellen Bowden McIntyre  
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